

# **POLLUTION PREVENTION IN PERMITTING PROGRAM (P4)**

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## **PROJECT HISTORY**

A P4 partnership was formed at an April 1993 conference on the role of the Clean Air Act in implementing P2. Through informal discussions between EPA Region 10 and the Office of Air Quality Planning and Standards (OAQPS), two key aspects of P2 implementation were recognized:

- ▶ a sources' pollution preventing behavior is, in part, a response to regulatory costs imposed by environmental management agencies; and
- ▶ under certain circumstances, regulatory costs can be modified by regulators to create incentives for pollution prevention.

The group also recognized that new regulatory programs, such as Title V of the Clean Air Act, can impose new costs on sources. Therefore, as sources decided how to respond to these costs, an ideal window of opportunity arose for regulators to test pollution prevention as a means of enhancing regulatory flexibility and reducing regulatory costs.

In a formal effort to incorporate the ideas generated by the ad hoc group, EPA Region 10, OAQPS, Oregon DEQ, and the Intel Corporation initiated the Pollution Prevention in Permitting Program (P4) in November of 1993. During the months that followed, the team, with support from the Pacific Northwest Pollution Prevention Research Center (PPRC), discovered ways within existing state and federal laws to craft a Title V permit that enhanced operational flexibility and created incentives for pollution prevention. The selection of the Intel Corporation presented an ideal challenge, as the company initially believed Title V was too inflexible to meet its operational needs, and considered instead the option of taking future plant investments "off shore."

By September of 1994, after a series of face-to-face meetings and interim conference calls, a draft Title V permit was developed that promoted pollution prevention and proactive environmental management, ensured full regulatory compliance, and was responsive to Intel's needs for operating flexibility. The permit was issued in October of 1995; since then, Intel has announced a \$500 million plant expansion

in the State of Oregon.

Soon after issuance of the Intel P4 permit, EPA obtained additional funding to support "P4 Phase II" that focused on four additional permitting efforts:

- ▶ EPA Region 1, Connecticut DEC, Cytec Industries;
- ▶ EPA Region 4, Georgia DNR, Searle Pharmaceutical;
- ▶ EPA Region 6, Albuquerque APCD, Rio Grande Portland Cement; and
- ▶ EPA Region 10, Washington DOE, Olympic APCA, Lasco Bathware.

These efforts further demonstrated the value of P4 in incorporating environmentally beneficial operational flexibility into Title V permits.

In August of 1996, funding for an additional project led to a P4 pilot with EPA Region 6, the Oklahoma Department of Environmental Quality, and Imation Enterprises. Further resources from EPA Headquarters and OAQPS also are being appropriated for P4 projects in additional EPA Regions, as well as P4 educational materials, a P4 permit writer's manual, and a P4 "benefits assessment."

The future of P4 holds many potential opportunities. It is anticipated that as part of P4's continued focus on Title V air permits, P4 permitting processes will become more streamlined and efficient, with an increased number of participants over time. In addition to its focus on Title V, the P4 approach may be modified to address minor source air permitting and NPDES permitting under the Clean Water Act.

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## **FOR MORE INFORMATION ABOUT P4....**

If you have additional questions about the P4 initiative, contact one or both of the following P4 Project Coordinators: **Dave Dellarco**, EPA Region 10, at 206/553-4978, or **Michael Trutna**, EPA OAQPS, at 919/542-5345.

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